

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both )  
individually and as Legal Guardian of )  
SHANE ALLEN LOVELAND, et al., ) Case No. 8:18-cv-00127  
)  
Plaintiffs, )  
)  
v. )  
)  
THE GOODYEAR TIRE & RUBBER )  
COMPANY, )  
)  
Defendant. )

**DISCOVERY STIPULATION FOR EXTENSION OF TIME TO COMPLETE  
DEPOSITIONS**

Plaintiffs, Rysta Leona Susman, as Legal Guardian of Shane Allen Loveland, and Jacob Summers, and Defendant, The Goodyear Tire & Rubber Company, pursuant to Local Rule 29.1, file this Stipulation for a change to the discovery schedule for the purpose of completing depositions:

1. The parties agree that the deadline to complete depositions is extended to November 15, 2019, for the following depositions:
  - a. The deposition of Goodyear's corporate representative pursuant to Fed. R. Civ. P. Rule 30(b)(6) on the topics defined in Plaintiff's notice of deposition, dated August 15, 2019.
  - b. The deposition of Goodyear employee, Michael Kearns;
  - c. The deposition of Kearney Towing & Repair Center, Inc., pursuant to Fed. R. Civ. P. Rule 30(b)(6);

- d. The depositions of the Kearney Towing & Repair Center, Inc. employees in any way involved in the installation of the tires on the accident vehicle at the time of this occurrence, specifically including those employee's whose initials or names appear on the service invoice relating to that installation;
  - e. The deposition of Dan Bueser and/or other current or former employee of Dandee Concrete Construction Company involved in any way in the transaction that led to the installation of the tires on the accident vehicle at the time of this occurrence.
2. Discovery is not extended for any other purpose.

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Edward S. Bott, Jr.  
Edward S. Bott, Jr.  
Clark W. Hedger  
Juliane M. Rodriguez  
10 South Broadway, Suite 2000  
St. Louis, MO 63102  
(314) 241-9090  
Fax: (314) 345-5465  
[esb@greensfelder.com](mailto:esb@greensfelder.com)  
[chl@greensfelder.com](mailto:chl@greensfelder.com)  
[jrodriguez@greensfelder.com](mailto:jrodriguez@greensfelder.com)

AND

BAIRD HOLM LLP  
Jennifer D. Tricker (NE# 23022)  
1700 Farnam Street, Suite 1500  
Omaha, NE 68102-2068  
(402) 344-0500  
[jtricker@bairdholm.com](mailto:jtricker@bairdholm.com)

*Attorneys for The Goodyear Tire & Rubber Company*

AND

By: /s/ Kyle W. Farrar  
Kyle W. Farrar  
KASTER, LYNCH, FARRAR & BALL, LLP  
1010 Lamar, Suite 1600  
Houston, TX 77002  
(713) 221-8300  
[kyle@fbtrial.com](mailto:kyle@fbtrial.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system and served to counsel listed below by electronic mail/shared file site this 23rd day of August, 2019 to:

Paul E. Godlewski  
SCHWEBEL, GOETZ & SIEBEN, P.A.  
80 South 8<sup>th</sup> Center  
5120 IDS Center  
Minneapolis, MN 54402  
[pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)

Michael F. Coyle  
FRASER, STRYKER LAW FIRM  
409 South 17<sup>th</sup> Street  
Suite 500, Energy Plaza  
Omaha, NE 68102  
[mcoyle@fraserstryker.com](mailto:mcoyle@fraserstryker.com)

*Attorney for Plaintiffs*

/s/ Edward S. Bott, Jr.